

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

INTERFOCUS INC., A California
Corporation,

Plaintiff,

v.

The Defendants Identified in SCHEDULE
A,

Defendant.

Case No.: 1:22-cv-2259

**PLAINTIFF'S EX PARTE MOTION FOR ENTRY OF A TEMPORARY
RESTRANDING ORDER, INCLUDING A TEMPORARY ASSET RESTRAINT, AND
EXPEDITED DISCOVERY**

Plaintiff INTERFOCUS INC. (“Plaintiff”) moves, *ex parte*, for entry of a temporary restraining order (“TRO”), including a temporary asset restraint, and expedited discovery.

The grounds for this motion are (1) Defendants, who are identified in Schedule A to the Complaint (filed under seal) are China or Hong Kong-based entities who misappropriated source code for Plaintiff’s website to set up their own website, and are using their website to offer for sale and sell counterfeit products into this District, including counterfeits of Plaintiff’s products. Grounds for this motion are further provided in the declarations of Amanda Richardson-Golden, Mark Lee, Robert Rosenblum, and Sandi Graham, and in the Memorandum of Law filed in support of this motion.

Date: May 3, 2022

Respectfully submitted,

RIMON, P.C.

/s/ Eric C. Cohen

Ill. ARDC No. 0473685
Rimon P.C.
980 N. Michigan Ave., Suite 1400
Chicago, IL 60611
Telephone: (984) 960-2860
Email: eric.cohen@rimonlaw.com

Mark S. Lee
Rimon, P.C.
2029 Century Park East, Suite 400N
Los Angeles, CA 90067
Telephone: 310.561.5776
Email: mark.lee@rimonlaw.com

Zheng Liu
Rimon P.C.
800 Oak Grove Ave., Suite 250
Menlo Park, CA 94025
Telephone: (650) 382-4546
Email: zheng.liu@rimonlaw.com

Attorneys for Plaintiff, INTERFOCUS INC.